CHAPTER 4: DESCRIPTION OF THE ONE-STOP SYSTEM

### Chapter 4: Description of the One-Stop System

Part 662 - Description of the One-Stop System Under Title I of the Workforce Investment Act

#### SUBPART A - GENERAL DESCRIPTION OF THE ONE-STOP DELIVERY SYSTEM

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What is the One-Stop delivery system?

hat does "no wrong door" mean?

Basically, the "no wrong door" concept means that customers are able to determine and access the services they need regardless of where they first access the local workforce system. Effective linkages among local programs and providers of services in the community make the no wrong door concept work.

#### SUBPART B - ONE-STOP PARTNERS AND THE RESPONSIBILITIES OF **PARTNERS**

Who are the required One-Stop partners? 662,200

ho are required One-Stop partners in Georgia?

WIA Section 121(b)(1) and Sections 662.200 and 661.315 of the WIA Final Rules identify the entities that are required partners in local One-Stop systems. The following are the state level administering agencies in Georgia:

- WIA title I adult, youth and dislocated workers (Georgia Department of Labor -
- National programs, including Job Corps and Migrant and Seasonal Farm Worker (MSFW) Employment and Training Programs (Job Corps, Telamon Corp.)
- Wagner-Peyser (GDOL Employment Service)
- Adult education and literacy activities (Department of Technical and Adult Education - DTAE, and Department of Education - DOE)
- Vocational Rehabilitation (GDOL Vocational Rehabilitation)
- Welfare-to-Work (GDOL)
- Older Worker programs (Department of Human Resources DHR/Division of Aging and Title V Grantees)
- Post-secondary vocational education activities authorized under Perkins (DTAE)
- Trade Act services (GDOL)
- Unemployment Insurance (GDOL)
- Community Services Block Grant employment and training activities (DHR/local Community Action Agencies - CAA)
- HUD Employment and Training activities (local housing authorities)

 Veterans employment and training services (GDOL Disabled Veterans Outreach Program and Local Veterans Employment Representatives)

662.210 What other entities may serve as One-Stop partners?

## $m{D}$ oes the State require any additional One-Stop partners to be included in local One-Stop systems?

In keeping with the vision for a comprehensive workforce development system, Temporary Assistance for Needy Families (TANF), Food Stamps, and Department of Corrections' employment and training programs are voluntary partners in Georgia's system. Local areas are encouraged to involve these partners on Local Boards and in their One-Stop systems. Local areas are also encouraged to think broadly about involving additional partners that could contribute to the success of the area's workforce system.

hat is the President's Faith-Based and Community Initiative, and how can we increase the involvement of faith-based and community organizations in our workforce system?

In January 2001, the White House Office of Faith-Based and Community Initiatives was created, with centers in seven cabinet departments to promote the initiative. The initiative aims to strengthen and expand the role of faith-based and community organizations in addressing the nation's social problems, by fostering an environment where faith-based organizations can compete equally with other groups to provide government or privately-funded services. The initiative focuses on the following populations: at-risk youth, ex-offenders, homeless, hungry, substance abusers, those with HIV/AIDS, and welfare-to-work families.

The White House maintains a variety of information about the faith-based initiative, including a weekly newsletter and legal guidance and funding opportunities for both workforce systems, and faith-based organizations (FBOs) and community based organizations (CBOs) at: <a href="https://www.whitehouse.gov/government/fbci/">www.whitehouse.gov/government/fbci/</a>.

There are currently Centers for Faith-Based and Community Initiatives (CFBCI) in 11 federal agencies, including USDOL. These initiatives strengthen the role of faith-based organizations nationally and often provide grants to do so. For example, more than \$2.1 billion in grants were awarded to religious organizations in FY2005 by seven federal agencies. Also, in 2006 alone, these Centers hosted 110 workshops, providing grant writing training to over 9,500 new and potential federal grantees. Since 2002, the Centers have hosted over 350 workshops across the country, training over 30,000 people.

USDOL's CFBCI web site is: www.dol.gov/cfbci.

662.220 What entity serves as the One-Stop partner for a particular program in the local area?

### Sections 662.230-662.280 – Partner Responsibilities

	in the required One-Stop partners?
662.230	What are the responsibilities of the required One-Stop partners?
	What are a program's applicable core services?
662.240	What are a program's approximate a contract make
	Where and to what extent must required One-Stop partners make

662.250 Where and to what extent must required One-Stop partners make core services available?

hat satisfies the law concerning access to our services at One-Stop locations? What's expected as far as physical out-stationing of staff?

Each local area must have at least one comprehensive physical center to provide core services specified in WIA Section 134(d)(2), and access to other services and activities carried out by the One-Stop partners. Customer needs and resources available should determine the number of comprehensive service sites beyond the one required by law.

At the comprehensive center(s) where required core services must be available, delivery options may include the following:

- Physical staff presence By physically locating staff at the center on a full or parttime basis (e.g., a WIA career advisor who is outstationed at a center outside his "home" office five half-days/week and provides full services)
- Funding by funding a staff person(s) who is already present to perform additional functions (e.g., to partially fund an intake worker, previously funded solely through Wagner-Peyser, with WIA funds to conduct WIA eligibility determinations)
- Facilitated access by facilitating access to services (e.g., a counselor in a center outside his or her "home" technical college who conducts initial screenings for potential students onsite, then schedules customers to receive full services at the college). If technology is utilized, facilitated access must be more than electronic access, e.g., knowledgeable staff must be available for assistance as needed

Section 662.100 also describes three other arrangements allowed to supplement the comprehensive center(s): a network of affiliated sites, a network of One-Stop partners, and specialized centers. A customer who enters the system at any of these three types of sites may receive some of the typical services at the site, as well as information about how and where all the other services provided through the broader One-Stop system may be obtained.

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Local Boards, including partners, should design local systems for maximum customer access to the full spectrum of workforce and related services, including intensive and training services. For a current list of the comprehensive/full-service centers in Georgia, visit <a href="www.dol.state.ga.us">www.dol.state.ga.us</a> (Workforce Professionals/Learn About WIA Services/Local Workforce Area Information/Local Workforce Area Contact Information, or see Appendix 2).

## Is a computer link an acceptable way to make core services of partners available at a comprehensive One-Stop center?

Although an automated link to partner core services is acceptable when co-location of staff is not feasible, knowledgeable staff must be available to help customers with the technology and content as needed - such as assisting with an online application for services, reaching partner staff when an email connection fails, or similar situations. Additionally, Section 652.207 of the regulations that govern the Employment Service indicate that in the one designated One-Stop center in each area, core and applicable intensive services, including staff assisted labor exchange services, must be provided. As you continue to build your local workforce systems, strive to make service access at you continue to build your local workforce systems, strive to make service access at spossible.

- What services, in addition to the applicable core services, are to be provided by One-Stop partners through the One-Stop delivery system?
- How are the costs of providing services through the One-Stop delivery system and the operating costs of the system to be funded?
- Does title I require One-Stop partners to use their funds for individuals who are not eligible for the partner's program or for services that are not authorized under the partner's program?

### SUBPART C - MEMORANDUM OF UNDERSTANDING FOR THE ONE-STOP DELIVERY SYSTEM

662.300 What is the Memorandum of Understanding (MOU)?

## $m{C}$ an a Memorandum of Understanding (MOU) be used to purchase services from a One-Stop partner?

No. Under WIA an MOU is an instrument designed to describe relationships between partners in the One-Stop system. A separately executed contract that conveys the assurances and compliance requirements is required to purchase services with WIA funds.

## hat is a Resource Sharing Agreement (RSA)? Exactly what services should we address?

RSAs are much more than a federal WIA requirement. From a practical standpoint, this is a way to define partner participation and contributions to the local systems as described in your MOU. RSAs also describe the benefits local partners will receive as a result of their participation in the system. As the development of local workforce systems is an evolutionary process, RSAs will be modified and refined over time.

Initially, local areas had the option of limiting RSAs to those partners participating in their designated comprehensive One-Stop center(s). However, local areas are encouraged to think as broadly as possible about service delivery to customers in local systems.

RSAs are generally attachments to an MOU. To ensure partners are fully committed to sharing the resources addressed in the RSAs, we recommend that you obtain signatures from all partners included in the RSAs.

For further guidance, the U.S. Department of Labor's July 2002 America's Workforce Network "One-Stop Comprehensive Financial Management Technical Assistance Guide" is available online at: <a href="https://www.doleta.gov/sga/pdf/FinalTAG\_August\_02.pdf">www.doleta.gov/sga/pdf/FinalTAG\_August\_02.pdf</a>.

## H ow often should local areas update the Resource Sharing Agreement?

Initial RSAs were required by the end of August 2001. Local workforce areas were asked to update their initial RSAs, in the fall of 2003, to ensure the agreements were in compliance with federal guidance entitled, "Resource Sharing for Workforce Investment Act One-Stop Centers: Methodologies for Paying or Funding Each Partner Program's Fair Share of Allocable One-Stop Costs" (66 Federal Register 29638, May 31, 2001).

Instructions for the 2005 and 2007 WIA planning processes stated that all Memorandums of Understanding, including Resource Sharing agreements, accurately reflect local area arrangements. Further guidance on updating all local agreements, including RSAs, was issued to local workforce areas via a GDOL memo dated February 8, 2006. Local areas were advised to review all agreements, including RSAs, to ensure that the agreements were signed, and without conditions that would render the document not valid (e.g. termination dates). Local areas were also advised to consult with the local government (city or county) attorneys who handle such matters for their Local Workforce Boards and CEOs to ensure that all agreements were valid, per federal laws and regulations, and per locally adopted requirements for the specific type of agreement.

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In Resource Sharing Agreements, how do we determine the contribution when a partner providing a service/item does so under a contract awarded by another partner – for example, when GDOL career center staff is paid under a Department of Human Resources (DHR) contract to provide retention services at the One-Stop for TANF customers?

Per Section 662.270 of the regulations, each partner must contribute a fair share of the operating costs of the One-Stop delivery system proportionate to the use of the system by individuals attributable to the partner's program. In the example cited, the TANF customer is served with funds attributable to the local Department of Family and Children's Services (DFCS) DHR funding source. Therefore, DFCS would claim the contribution. In the same manner, the value of services provided at the One-Stop center under a WIA contract would be a contribution of the WIA administering agency.

In determining a GDOL career center's contribution to a Resource Sharing Agreement, would the entire budget of the center be included? The tax unit occupies part of the building, but is not included in the career center budget and does not provide direct One-Stop services to customers.

Since the services provided at a career center under GDOL's various fund sources would be considered "core" or "intensive" services, the entire budget could be included. However, an adjustment to the contribution in the amount of any (material) income realized would be needed if a portion of the facility is occupied by staff or another agency not directly involved in the provision of core, intensive, or training services. In this example, the space and other related costs would need to be adjusted for the tax unit.

In "counting" customers to determine proportionate benefit for our Resource Sharing Agreement, is it okay to use the sign-in log to count those who just use the resource room or those who are immediately referred somewhere else without receiving assisted services? We want to show the high level of customer service we provide.

There are several possible methods for determining proportionate benefits, and the method chosen is a local area decision. The methodology used should be based on local area circumstances, and should simplify the documentation and monitoring process so the focus remains on services provided to customers through the One-Stop rather than the tracking of services.

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If the local area has elected to use participant count as the allocation methodology, documentation could include a sign-in log containing enough information to determine the level of benefit to partner programs. The log could contain participant and referral information as well as a listing of the customer's activities with partner programs.

As GDOL moves forward with the implementation of common measures as outlined in TEGL 17-05, Common Measures Policy for the Employment and Training Administration's (ETA) Performance Accountability System and Related Performance Issues, there will be changes to the GWS that allow local areas to track customers in both self-service and informational services as well as staff-assisted core services. These changes will facilitate the collection of more information on the types of services being provided and will produce a better count of the customers receiving any level of service. However, since these GWS changes will take time to develop, local areas relying on participant counts as an allocation methodology should continue to use the most efficient mechanism currently available for documenting the number of customers served.

# May computers or other equipment purchased with WIA funds be used for non-WIA customers?

The sharing of resources is a cornerstone of WIA. When computers are purchased with WIA funds as part of a joint project to serve customers of more than one agency and each agency contributes resources to the cost of the project, cost effectiveness is achieved and all parties in the workforce system benefit. In other words, the total cost of the project should be shared among all agencies by a generally acceptable allocation methodology.

For example, when computers are purchased for use at a One-Stop center by one of the partners, the cost would be recorded as a contribution by that partner in the local RSA and the computers could be used by customers of all partners.

How will local workforce boards access Wagner-Peyser funds and how will existing staff be transitioned to provide service functions in local One-Stop systems? How will Unemployment Insurance (UI) staff and services be transitioned? Conversely, how will GDOL career centers access WIA funds?

There will be no automatic exchange of funds or staff among organizations. Decisions regarding how Wagner-Peyser, UI and all otherwise funded services will be delivered should result from ongoing service mapping and MOU development among local area partners. It is through these processes that the service of partners will be spelled out in each local area. Funds will be tied to the staff that provide the services. GDOL staff will work closely with local partners to balance local service delivery needs with federal requirements. This was a new approach for partners under WIA, and we should expect evolution as we continue to be more knowledgeable, creative, and informed of each other's services.

C an a customer receive non-WIA funded intensive services at a GDOL career center? Please explain when this might happen, and the advantages and disadvantages.

Yes. No matter what the fund source, customers can access core and intensive services at a GDOL career center. Depending on local arrangements, services could be available from Wagner-Peyser, Adult Education, Rehabilitation Services, Job Corps, local housing authorities, and others. The local workforce board will work with partner organizations to decide which partners will provide various services within the local systems. MOUs should spell out this structure and wide array of resources available onsite or electronically. WIA is a limited funding source and should be accessed after other available resources are used. For this reason, for example, it may be quite common for the DHR/GDOL contract funds to be a "first funding" source for intensive services for TANF recipients rather than WIA.

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Is there a single MOU for the local area or are there to be separate MOUs between the Local Board and each partner?

Ve know that if a partner fails to meet the responsibilities of required One-Stop partners and an impasse cannot be resolved, the partner that fails to execute a MOU may not serve on the Local Board. Must partners who enter into a MOU also serve on the Local Board? Relatedly, can we have partners that are not full partners, i.e., partners who either do not enter into a MOU or do not serve on the Local Board?

When a required partner provides services in a local area, this entity must be a full partner by entering into a MOU and serving on the Local Board. However, not all required partners must be full partners.

For example, if Dynamic Educational Systems, Inc. (the Job Corps outreach and admissions service provider in several areas of Georgia) is not located in your area, you might have the Job Corps representative enter into a MOU regarding access to services, but might not have them on the board. Or, if your area is not served by a Title V (Senior Employment and Training) provider, you might have AARP (for example) enter into a MOU regarding services, but might not have them on the board. Then again, you might have them be full partners via entering into a MOU and involvement on the board.

Optional partners who enter into a MOU to provide specific services in a local workforce system do not have to serve on the Local Board, although they certainly may be full board members, or may serve in an advisory or adjunct capacity, depending on Local Board policy. Certainly this might happen with non-WIA local partners. One mechanism for involving partners providing youth services is to invite them to join the youth council.

### That should we do if we've reached an impasse between our local workforce board and a particular partner?

The Georgia Department of Labor is available to provide mediation assistance to local areas, if needed. Contact GDOL Career Development Services for assistance.

### o optional partners have to execute an MOU the same as mandatory partners?

Yes. The expectation is that the MOU is the vehicle for addressing services, costs, referrals, and other operational details of all partners participating in the One-Stop system.

#### SUBPART D - ONE-STOP OPERATORS

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Who is the One-Stop operator?

### I hat is the difference between the role of the One-Stop operator and the grant subrecipient?

In the law, the One-Stop operator function is clearly separated from the role of grant subrecipient. The chief local elected official and the board may select the same entity to serve as both grant subrecipient and One-Stop operator, but the conditions defined in the law for selecting One-Stop operators will have to be met:

- Selection through a competitive process, or
- Designation of a consortium that includes three or more required One-Stop partners

The local WIA board or its staff may not serve in this capacity unless this request is made by the chief local elected official and agreed to by the Governor. Additionally:

- Elementary or secondary schools are not eligible for designation as a One-Stop operator except for nontraditional public secondary schools and area vocational education schools
- In an area where a One-Stop center/system was already established prior to enactment of WIA, an existing entity may be designated as the One-Stop operator if the local grant recipient and the Local Board so choose

How is the One-Stop operator selected? 662.410

extstyle
eg an a Regional Development Center (RDC) that is the WIA grant subrecipient, also be one of the One-Stop system consortium members?

Yes. There is nothing in the Act or Final Rules that prohibits this arrangement.

- Under what limited conditions may the Local Board be designated or certified as the One-Stop operator?
- Under what conditions may One-Stop operators designated to operate a One-Stop delivery system established prior to the enactment of WIA be designated to continue as a One-Stop operator under WIA without meeting the requirements of Sec. 662-410(b)?

# CHAPTER 5: ADULT AND DISLOCATED WORKER ACTIVITIES

#### **Adult and Dislocated Worker Activities** Chapter 5:

Part 663 - Adult and Dislocated Worker Activities Under Title I of the Workforce Investment Act

#### SUBPART A - DELIVERY OF ADULT AND DISLOCATED WORKER SERVICES THROUGH THE ONE-STOP SYSTEM

What is the role of the adult and dislocated worker programs in the 663.100 One-Stop delivery system?

When must adults and dislocated workers be registered? 663.110

That eligibility details are there for adults and dislocated workers?

The State has developed no eligibility requirements beyond those stated in the Act and regulations, which include minimal eligibility requirements for adults and just a few requirements for dislocated workers. The complex eligibility process required under the former Job Training Partnership Act (JTPA) program does not exist under WIA. Local areas must set policies for service priorities if they determine the need is greater than funds available.

### Tas the State issue policies regarding which items must be documented II for eligibility?

WIA offers very few eligibility guidelines, the most important of which is that the service must be needed. The State has no plans to issue policies regarding documentation - this is a local decision. The Georgia Workforce System (GWS) is Georgia's way to capture the information to be collected at various points of intake, planning, service provision, and follow-up, but policies on eligibility documentation are determined locally.

WIA does not require verification of every data element; data verification is a local area responsibility. Local areas should establish a process to verify that customer data (both at intake and after exit) is accurate and defensible; for example, sampling.

Please note that the State requires data collected by local areas to be in compliance with the data validation requirements identified in Training and Employment Notice (TEN) 9-06. TEN 9-06 provides guidance for data validation implementation for WIA, Trade, and Wagner-Peyser (ES). (The U.S. Department of Labor's (USDOL) deadline for completing PY 2006 WIA report and data element validation is April 1, 2007.) The most current information on the data validation process, including user guides and handbooks, can be found at: www.doleta.gov/performance/reporting/.

Contact Management Information and Customer Support or the GDOL Career Development Services Division for additional information.

### hat is phased data collection?

The concept of phased data collection means that information is gathered from a customer as it is needed to serve that particular customer. Phased data collection is in contrast to a less customer friendly system that requires the gathering of a large amount of information from all customers up front, just in case it is needed at a later date.

The process by which information is collected is a local option, up to the point when WIA registration is required, i.e., when the adult customer actually receives intensive and/or training services funded by WIA. Phased data collection is the basis of the GWS.

# That are USDOL's requirements related to serving individuals who are not citizens of the United States?

Please note the following from WIA Section 188(a)(5) – Prohibition on Discrimination Against Certain Non-Citizens:

"Participation in programs and activities or receiving funds under this title shall be available to citizens and nationals of the United States, lawfully admitted permanent resident aliens, refugees, asylees, and parolees, and other immigrants authorized by the Attorney General to work in the United States."

Regarding the use of WIA funded staff for on-the-job training (OJT) at Georgia Department of Labor (GDOL) career centers, do we register customers for WIA upon receipt of intensive services even if they don't go on to training?

Yes, in some cases. If WIA funds the GDOL career center staff providing these intensive services, the customer must be registered for WIA. The array of services to be provided by WIA funded staff at a career center should be spelled out in a contract. Please note that a Memorandum of Understanding (MOU) will not suffice to transfer WIA requirements to a service provider, even if the provider is GDOL.

Not everyone registered under WIA will be willing, able, or appropriate for training. In many cases, intensive services will meet customers' needs. Initial assessment results should provide a good indicator of whether OJT is appropriate for the customer prior to WIA registration.

After a more comprehensive assessment as part of intensive services, the customer and career advisor may discover that OJT is not the right step at this time. Other appropriate services should be provided and tracked to ensure the customer meets his or her employment goals.

## Can victims of natural disasters, such as farmers during serious droughts, be served as dislocated workers?

Yes. Farmers who were self-employed and are unemployed as a result of general economic conditions in the community in which they reside, or as a result of natural disasters, may be determined eligible dislocated workers. They may be served with formula or other funds.

## In regard to dislocated worker eligibility, how should we show that a self-employed farmer is now unemployed due to the drought?

As for any WIA applicant, staff should determine the need for services, given all the other resources available in the workforce system. In this case, the individual is being considered to be a displaced worker under the category "was self-employed (including employment as a farmer, a rancher, or a fisherman) but is unemployed as a result of general economic conditions in the community in which the individual resides or because of natural disasters," per WIA section 101(9)(C). Therefore, records should show that the individual was self-employed as a farmer and the circumstances that explain lack of employment due to the drought. Supporting information should be noted to record that the individual meets the criteria to quality for WIA services.

For data validation purposes, the applicable element subject to verification would be the date of the actual qualifying dislocation. Acceptable documentation for this data element would include self-attestation, i.e., a signed and dated statement from the applicant attesting that the information provided in true. Supporting documentation may be provided such as a newspaper article describing the drought conditions in the region at the time of the dislocation.

### noes WIA approval cross state lines?

No. WIA registration does not cross state lines. Most border areas are working with local areas in neighboring states to streamline service needs of employers and job seekers across state lines. As with any other potential customer, staff should explore the customer's needs and available resources in the area, including WIA if appropriate.

- What are the eligibility criteria for core services for adults in the adult and dislocated worker programs?
- What are the eligibility criteria for core services for dislocated workers in the adult and dislocated worker programs?

### Can workers who take early retirement be considered dislocated workers?

Yes. Georgia employers (e.g., Delta, Lucent, and others) may offer a variety of options to workers when a decision has been made to reduce the size of the company's workforce. Options available to workers may include early retirement, voluntary leaves of absence, and voluntary layoffs. When companies present these alternatives to workers in an effort to reduce the number of workers that must be involuntarily separated, any individual who accepts one of these options and desires to return to full-time employment meets the "terminated or laid off" criterion included in the first or second definitions of a dislocated worker at WIA 101(9); i.e., "an individual who has been terminated or laid off, or who has received a notice of termination or layoff from employment..."

Does an individual have to actually receive unemployment insurance (UI) to meet the criterion "is eligible for or has exhausted entitlement to unemployment compensation" in the definition of a dislocated worker at WIA 101(9)?

No, not necessarily. Not receiving UI does not mean an individual cannot meet that criterion. There are a number of reasons that may cause an individual to be "disqualified" from receiving UI, including the payment of severance, separation pay, or retirement. Individuals disqualified from receiving UI because they have received severance or separation pay or will receive retirement pay, still meet the criterion because they have worked in covered employment (employment for which the employer is required by law to pay unemployment taxes). The same is true for an individual who may not have sufficient earnings to qualify for unemployment insurance, but worked in covered employment.

An individual who did not work in covered employment, i.e., the employer was not required to pay unemployment insurance taxes on behalf of the individual, could not meet the definition of a dislocated worker based on the criterion that requires the individual to be eligible for or exhausted entitlement to unemployment. However, the individual might be determined eligible based on one of the other categories of dislocated workers, e.g., due to a business closure, or due to having been a self-employed individual.

## $m{H}$ ow do we determine whether an individual is "unlikely to return to a previous occupation or industry"?

This decision should be based on a review and assessment of an individual's work history, skills, training, and education. It should also take into consideration the local labor market conditions to determine if the occupation or industry is declining or if comparable jobs are unavailable. The final determination is the responsibility of the local workforce development professional based on knowledge of the local labor market and an assessment of the customer's abilities.

### That constitutes a substantial layoff?

A substantial layoff is defined as a layoff of at least:

- 50 individuals making up at least one-third of the workforce; or
- 500 workers at a single site

A layoff may also be determined to be substantial based on its impact on a local community. Rapid Response staff will assist in determining substantial layoffs when fewer than 500 or one-third of the workers are impacted.

Are displaced homemakers eligible for dislocated worker activities under WiA?

# ho should we register as displaced homemakers under WIA?

Under WIA section 101(9), displaced homemakers who meet the definition at WIA section 101(10) are eligible dislocated workers without any additional determination. Please note that individuals who have been on public assistance are not automatically considered displaced homemakers under WIA, unless they had been dependent on a family member's income and no longer have that income.

- 663.145 What services are WIA title I adult and dislocated workers formula funds used to provide?
- 663.150 What core services must be provided to adults and dislocated workers?

### an the State provide a definitive list of core services?

With the implementation of common measures as outlined in TEGL 17-05, Common Measures Policy for the Employment and Training Administration's (ETA) Performance Accountability System and Related Performance Issues, it is helpful to distinguish between Non-Staff-Assisted Core Services (Self-Service and Informational Core Services) vs. Staff-Assisted Core Services. The scope of WIA-funded services that States must report on has greatly increased, and staff should review TEGL 17-05 for a more detailed explanation of these services. In the TEGL, USDOL makes it clear that States must report on the number of individuals receiving Self- and Informational Core Services, and must also be accountable for performance outcomes on customers receiving WIA-funded Staff-Assisted Core Services. This fundamentally changes the way in which Georgia has been reporting WIA services. The State, with input from local areas, is currently exploring ways in which this information can be collected accurately, efficiently, and in a customer-friendly manner.

The following is a list of categorical core services based on TEGL 17-05.

not require significant  Self-Services/ Informational Activities	Self-service and informational activities are those core services accessible to the general public electronically or through a physical location that are designed to inform and educate individuals about the labor market and their employment strengths, weaknesses, and the range of services appropriate to their situation, and that do not require significant staff involvement with the individual. While local areas will be required to count the number of individuals receiving these services, receipt of these services alone would preclude the customer from being included in performance calculations. If these services require significant staff involvement, however, customers would be included in WIA performance calculations.
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STAFF-ASSISTED CORE SERVICES – Significant staff involvement is any assistance provided by staff beyond the informational activities described above regardless of the length of time involved. Significant staff involvement includes a staff member's assessment of a participant's skills, education, or career objectives in order to assist participants in making career-related decisions. On the other hand, when a staff member provides a participant with readily available information that does not require an assessment of the participant's skills, education, or career objectives, the customer is receiving an informational service.

Career Guidance Services	Staff-assisted career guidance services include the provision of: information, materials, suggestions, or advice which is intended to assist the job seeker in making occupation or career decisions.  Staff assisted workforce information services include
Workforce Information Services	Staff assisted workforce information market conditions, information on: state and local labor market conditions, industries, occupations and characteristics of the workforce; area business identified skills needs; employer wage and benefit trends; short and long term industry and occupational projections; worker supply and demand; and job vacancies survey results. Workforce information also includes local employment dynamics information such as workforce availability; business turnover rates; job creation; and job identification of high growth and high demand industries.
Job Search Activities	Activities which are designed to help carry out a successful job hunting strategy include: resume preparation assistance, job search workshops, job finding clubs, and development of a job search plan.  Resume Assistance - Providing instructions on the content and format of resumes and cover letters and providing assistance in the development and production of the same.  Job Search Workshops - An organized activity that provides instructions on resume writing, application preparation, interviewing skills, and/or job lead development.  Job Finding Clubs - have all the elements of a Job Search Workshop, plus a period of structured application where participants attempt to obtain jobs.  Job Search Planning - Development of a plan (not necessarily a written plan) that includes the necessary steps and timetables to achieve employment in specific occupational, industry, or geographic areas.
	Note: This definition excludes participants who receive workforce information services or attend a TAP employment workshop. Those services will be collected and reported separately.  A referral to employment is: the act of bringing to the attention are in earlier or group of registered job seekers
Referred to Employment	A referral to employment is: the act of orniging to of an employer a job seeker or group of registered job seekers available for a job, and the record of such a referral.

Other Staff-Assisted Core Services

These additional staff assisted core services may include, but are not limited to: reemployment services; federal bonding program; job development contacts; referrals to educational services; and tax credit eligibility determination.

### That constitutes follow-up services for adults under WIA?

Under WIA, a continuum of services to help individuals is a priority, not only to help them find employment but to acquire new skills and move up a career ladder. Follow-up services must be made available as appropriate to adults and dislocated workers for not less than 12 months after the first day of employment.

In the preamble to the Final Rules, pages 49319-49320, USDOL acknowledges that, "...not all of the adults and dislocated workers who are registered and placed into unsubsidized employment will want or need such services." USDOL does not dictate which services to provide and suggests that the intensity of these services will vary depending on the needs of the customer. "Follow-up services could include, but are not limited to: additional career counseling; contact with the participant's employer, including assistance with work-related problems that arise; peer support groups; information about additional educational opportunities; and referral to supportive services available in the community."

Meaningful periodic contact with customers helps staff track customer progress both for customer career advancement and WIA documentation purposes. For example, rather than merely making follow-up calls inquiring how employment is going, consider offering evening or weekend workshops that "draw" customers in to the office (or other community location). Examples of topics that might be valued by employed customers include: How to Get Promoted (Career Advancement), Becoming a Successful Home Owner, Successful Entrepreneurship, Money Management, Computer Literacy, etc. The best way to determine what follow-up workshops would be of value to working customers is to ask them. This can also be an opportunity to involve business and other community partners who can contribute to the success of these follow-up events.

### How do you determine if a WIA customer should exit and receive follow-up services, or remain in WIA and receive limited services?

Services should be provided based on the needs of the customer. When a customer has achieved his or her goal(s), such as getting a job or completing training, it will generally be appropriate to record an end of service date and begin providing follow-up services as needed. There will always be exceptions; a career advisor or service provider will be in the best position to make this determination in consultation with the WIA grant administrator.

### hat does "just in time" service mean?

Just in time service means focusing on providing the right services at the right time to meet a customer's needs. Focusing on customers' needs means being as flexible and responsive as we can possibly be, within whatever legal or regulatory constraints we have.

Are there particular core services an individual must receive before receiving intensive services under WIA section 134(d)(3)?

663.165 How long must an individual be in core services in order to be eligible for intensive services?

### an initial assessment be a "gateway activity"?

Yes. Local areas may establish gateway activities, which lead to participation in the next level of services. For example, an initial assessment or job search may be the gateway activity that bridges the customer from core to intensive services.

## That is a Service Needs Evaluation?

A Service Needs Evaluation is a core service that helps the customer make an informed choice by providing a clear picture of the services that might be beneficial and appropriate for the customer. (In a GDOL career center, this initial assessment is required for customers of Claimant Assistance Program (CAP), Profiling, Temporary Assistance for Needy Families (TANF), and Food Stamps, and is optional for others.) The customer may complete a Service Request Form (WDS-6) that lists the available core services in the local area to facilitate the evaluation. The Service Needs Evaluation is the basis for the delivery of core services, and may lead to identification of the need for more intensive services. It serves as the minimal core service that is required before a customer can receive intensive services. An abbreviated form may be used for the Service Needs Evaluation when time is an issue. The abbreviated form is the How May We Help You Form (GWS-11).

### SUBPART B - INTENSIVE SERVICES

What are intensive services for adults and dislocated workers?

663.210 How are intensive services delivered?

an a local grant subrecipient provide intensive services under WIA?

Yes. This is okay if the local grant recipient and the Local Board so choose. The Local WIA Board and its staff, however, may not provide intensive services unless the chief elected official and the Governor have granted approval to do so.

663.220 Who may receive intensive services?

Is self-attestation an acceptable methodology for documentation of eligibility for intensive and training services (e.g., selective service, work eligibility, dislocated worker status, economically disadvantaged)?

WIA does not require verification of every data element; data verification is a local area responsibility. Areas should establish a process to verify that customer data (both at intake and after exit) is accurate and defensible; for example, sampling. Once the local area has determined what elements will be verified for eligibility purposes, the local area is required to utilize the data element validation guidance located within TEN 9-06, issued in August of 2006 to ensure that correct documentation is being collected. Note issued in August of 2006 to ensure that correct documentation is being collected. Note it is elf-attestation is being utilized, it is important to gain the customer's signature and date on the form as well. In some cases, using a self-attestation may also require a case manager's signature and date, as well. Visit <a href="https://www.doleta.gov/performance/reporting/">www.doleta.gov/performance/reporting/</a> for more information on TEN 9-06 or contact GDOL Management Information and Customer Support or Career Development Services for suggestions on data verification methods.

o customers have to "fail" in order to get intensive services?

No. A system that requires customers to "fail" in order to receive intensive services or that makes customers *feel* they have failed sends a negative message and is not customer-focused. The regulations specify only that individuals must have received at least one core service and must be determined to be in need of more intensive services. Although customers often receive several core services (e.g., orientation, Internet browsing, job search assistance), the Service Needs Evaluation can serve as the one core service a customer must have before intensive services are provided.

In other words, if you have determined through the Service Needs Evaluation process that a customer needs intensive services, provide the service without any additional obstacles or inconvenience to the customer. If policy in your area seems to place obstacles before your customers' needs, e.g., 12 job interviews ending in rejection, you and your partners need to update the policy to be more customer-friendly.

M ust we document a number of failures to keep a job to make a customer eligible for intensive services?

No. The customer must only have received a core service and a basic Service Needs Evaluation indicating that more intensive services are needed.

663.230

What criteria must be used to determine whether an employed worker needs intensive services to obtain or retain employment leading to "self-sufficiency"?

## Has the State Board established criteria for determining whether employment leads to self-sufficiency?

No. The development of self-sufficiency criteria has been left up to Local Boards. At minimum, self-sufficiency criteria must mean employment that pays at least the lower living standard income level (LLSIL), as defined in WIA Section 101(24), with additional exceptions for dislocated workers and the special needs of individuals with disabilities.

663.240

Are there particular intensive services an individual must receive before receiving training services under WIA section 134(d)(4)(A)(I)?

# How do you determine what assessment is right for a customer?

Sections 663.240 and 663.310 of the WIA Final Rules require an assurance as to the need for training and the ability of the customer to successfully participate whenever adult or dislocated worker funds are used to support training. This decision must be supported by an interview, evaluation or assessment, and case management, and must be documented in GWS or in some cases, the case file.

Customer-driven assessment services mean guiding customers to make an informed choice about a course of action that best meets their needs and interests and maximizes their employment opportunities. The appropriate assessment method to provide that guidance depends on the customer – one size does *not* fit all.

The "Guide For Shared Assessments," developed jointly by the Georgia Departments of Human Resources, Labor, and Technical and Adult Education in 1998, although dated in some areas, may be helpful in determining the appropriate tool(s) for a particular customer. (Each local workforce area should have a copy of the Guide.) Over 40 aptitude, interest, job matching software, achievement/abilities, job readiness, skills and personal traits tests were evaluated and the strengths and weaknesses of each are identified.

Additionally, when a customer has already been assessed, the guide provides information on the content and purpose of the instrument used. With that information, staff can better determine whether use of the previous test results is appropriate. A new assessment is not required if you determine it is appropriate to use a recent assessment conducted by another education or training program.

Additionally, TEGL 17-05 lists acceptable assessment instruments for Youth Literacy/Numeracy and also provides references for testing youth with disabilities.

(WIA Section 129(c)(1)(A) lists the requirements of an objective assessment for youth.)

### hat is comprehensive in-depth assessment?

In-depth assessment is an intensive service that reviews a customer's skills, needs, and interest for assistance beyond core services, with results typically used in development of an individualized Customer Service Plan. Specialized tests and assessment instruments or activities may be used to evaluate a customer's aptitudes, achievement, interests, values, skills and potential employment barriers. Comprehensive assessment is appropriate for customers needing a thorough analysis of strengths and weaknesses related to the employment and training process.

## hile comprehensive assessment is required for those served in the WIA youth program, is it optional for all others?

Comprehensive assessment is not required for each customer served with WIA adult or dislocated worker funds. However, in order to determine who may receive WIA-funded training services, all adult/dislocated workers must have received an interview, evaluation or assessment, and case management; must be determined to be in need of training; and must have the skills and qualifications to successfully complete the selected training program. In order to make a quality training determination, some level of assessment will generally be appropriate. A comprehensive assessment/development of a Customer Service Plan will often serve as the one intensive service required prior to training.

### an you tell us about the O\*NET assessment tools?

The O\*NET Career Exploration Tools are a suite of assessment instruments designed for career counseling, career planning, career exploration, and career guidance. The tools include the following:

- The O\*NET Interest Profiler (paper-and-pencil and computerized versions)
  The O\*NET Interest Profiler identifies the type of work activities and tasks an individual would enjoy on the job.
- The O\*NET Work Importance Locator (paper-and-pencil and computerized versions)
- The O\*NET Work Importance Locator helps an individual clarify what is most important to them in their jobs. It can then identify O\*NET occupations that the individual is likely to find satisfying, based on the similarity between what is important to them in a job and the characteristics of the occupations.

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#### • The O\*NET Ability Profiler

The O\*NET Ability Profiler is an assessment developed for counseling and career exploration that measures nine job-relevant abilities. The nine job-relevant abilities are: Verbal Ability, Arithmetic Reasoning, Computation, Spatial Ability, Form Perception, Clerical Perception, Motor Coordination, Finger Dexterity and Manual Dexterity. An individual can then use the results of the assessment to identify their strengths and identify occupations that fit their strengths. The results can also identify areas for which an individual might need more training and education.

For additional information about the O\*NET tools and/or to download the tools, please visit: www.onetcenter.org

What is the individual employment plan? 663.245

Ts an individual employment plan (IEP) required for customers L receiving intensive services or training?

Although an individual employment plan (often called a Customer Service Plan in Georgia) is not required, local workforce areas are encouraged to develop individualized employment plans for participants entering training. The customer service plan is developed jointly by the customer and staff to facilitate a productive occupational selection and to formulate steps to achieve this plan. Through an in-depth interview and evaluation, it identifies whether or not additional assistance, including training, is needed. It may lead to further assessment or to a training evaluation. The development of this plan is an intensive service.

663.250

How long must an individual participant be in intensive services to be eligible for training services?

T as the State established minimum and/or maximum time periods for customers participating in intensive services?

No. Customer participation in intensive services should be based on the specific needs of each customer.

#### SUBPART C - TRAINING SERVICES

What are training services for adults and dislocated workers? 663.300

re services such as literacy, adult education, basic skills, and GED preparation provided apart from a vocational training activity considered training?

No. WIA Section 134(d)(4)(D) states that training services may include adult education and literacy activities, but only when provided in combination with occupational skills training, OJT, programs that combine workplace training with related instruction, private sector training programs, skill upgrade and retraining, entrepreneurial training, and job readiness training. If pre-vocational services such as adult basic skills education or GED preparation do not have an occupational component, they are considered intensive services. Remember that literacy services are often available from resources in the community other than WIA. Career advisors must explore all options to be flexible in meeting a customer's needs.

We know Georgia is facing a critical teacher shortage and think some of our customer would make excellent teachers. Can you give us information about the "teach quicker" programs in Georgia?

Local school systems, colleges and universities, the Regional Education Service Agencies (RESAs) and the Professional Standards Commission responded to the anticipated 2000-2001 teacher shortage in Georgia with the introduction of the Georgia Teacher Alternative Preparation Program (Georgia TAPP). Georgia TAPP is a classroom-based teacher preparation option for individuals who have the basic qualifications to teach early childhood, middle-grades, secondary or P-12 education but have not completed a teacher preparation program. The Georgia TAPP model involves intensive monitoring, supervision, and mentoring during a two-year induction period. (Visit the Georgia Professional Standards Commission at: www.gapsc.com/.)

Information about Georgia Troops to Teachers program, for men and women who have served as members of the Armed Forces and are now seeking a second career as teachers in America's public schools, is also available at: www.gapsc.com/.

Information about Georgia Spouses to Teacher (STT) program is also at www.gapsc.com. STT makes it easier for military spouses to obtain teaching credentials in Georgia in a variety of ways, which may include the provision of funding toward costs related to teacher certification testing profession.

TeachGeorgia at www.teachgeorgia.org/ has additional resources for persons preparing to be teachers, including teaching incentives, job postings, and job fair announcements.

Who may receive training services?

That determines the need for training for adults and dislocated workers?

In the simplest terms, the inability to get and/or keep a job paying a self-sufficient wage demonstrates the need for training. However, several steps must occur before WIA funds are used for training.

Adults and dislocated workers must receive at least one core and intensive service prior to being determined eligible for training. (Examples of core and intensive services are found in Section 134(d)(2) and (3) of the Act and Section 663.150-663.250 of the WIA Final Regulations.)

If staff determines that an adult customer is unable to find a job or has a job that does not lead to self-sufficiency after core services, the individual can receive intensive services. (See Section 663.230)

Intensive services are intended to identify obstacles to employment through a comprehensive assessment or individual employment plan in order to determine specific services needed, such as counseling and career planning, referrals to community services, and if appropriate, referrals to training.

Intensive services should deal with issues like personal barriers or exploration of career options. Such services may be all that is needed for the customer to become employed. There is no federal or state-required minimum time for participation in intensive (or core) services before receiving training services.

Next, staff must make a determination that the individual cannot obtain or retain employment without training services. This determination can be made through an interview, or evaluation or assessment of the individual's work experience, knowledge, education, training, and needs. The results of this interview, evaluation, or assessment should be briefly documented in the customer's service record.

Once a determination is made that training is necessary, WIA staff and the customer must agree that the training must be linked to demand occupations in the local area or in a geographic area where an individual is willing to relocate. It is not appropriate to enroll an individual in training for which the participant does not have the skills and abilities to successfully complete.

# I hat does the State mean by "guided customer choice"?

Informed customer choice is a key principle of WIA. Georgia uses the concept of guided customer choice, in which WIA workforce staff and partners make information and resources available to job seeker customers so they can make informed decisions about career and educational directions.

When a customer expresses interest in education or training opportunities through the Individual Training Account/Eligible Provider List (ITA/EPL) system, on-the-job training, or other activities, staff guides the customer through all aspects of the decision process. This may include exploration of aptitudes, a discussion of career interests, providing job information (e.g., skill requirements, salary and benefit information), and information on growth occupations in the customer's desired geographic location.

Some customers may have already obtained this information from the web-based information in a resource center, community location, or at home, but prior to obtaining an ITA or referral for other type of training services, staff will discuss these issues with the customer.

Customers with barriers to employment or training will receive as much assistance in their decision process as they need.

663.320 What are the requirements for coordination of WIA training funds and other grant assistance?

Inder WIA, how do we handle plant closures? Do we register everyone? Relatedly, what should local areas be doing to coordinate Trade Adjustment Assistance (TAA) and Trade Readjustment Allowance (TRA) with WIA dislocated worker services?

The responsibility of the notification of a plant closing or any layoff event falls on the entire rapid response team (normally the local GDOL career center manager, the local workforce area director, and the regional rapid response coordinator). Whoever is notified first will contact the other two partners. At that point the team will schedule a meeting with the affected plant's management.

The design for services, whether funded by WIA or TAA, for individuals who are impacted by a plant closing is similar. The team meets with the employer to determine the set of circumstances impacting the closing. That discussion enables the rapid response team to best design the services appropriate for the impacted workers. As services for each individual are identified, services from ES, WIA, Trade, Pell, HOPE and other sources are brought to the table as needed.

Co-enrollment among ES, WIA and Trade to maximize services is encouraged by both USDOL and GDOL when feasible and beneficial to the customer. Register those individuals who need WIA-funded intensive or training services when they need those services. There is no need to register anyone for WIA at layoff unless they will begin receiving WIA funded intensive or training immediately. If the dislocated worker comes from TAA certified layoffs, that fund source is available for services based on the comprehensive assessment completed.

How does Trade Adjustment Assistance (TAA) tie in with WIA?

TAA is one of the required partners in the One-Stop system. A large proportion of TAA-eligible individuals who enroll in training are also enrolled in WIA programs. Georgia, upon recommendation of a workgroup comprised of WIA directors and staff, career center managers and staff, and state staff, implemented a procedure in which all TAA-eligible individuals interested in training are referred to WIA for assessment and completion of the TAA Application For Training form.

This procedure preceded USDOL's push for integration of WIA and TAA and put Georgia "ahead of the pack" in this area. The two programs are working toward a seamless system wherein WIA and GDOL/TAA work together to help individuals transition from the loss of a job to a new career.

# $oldsymbol{H}$ ow can we find out more about Trade Act programs?

The Trade Act Manual, which contains a wealth of information about Trade Reeadjustment Allowances (TRA), Alternative Trade Adjustment Assistance (ATAA), Reemployment Services, Health Coverage Tax Credit (HCTC), and other related topics, is maintained by GDOL Dislocation Services. Each local workforce area should have at least one copy and receive periodic updates. Please contact GDOL Dislocation Services or Career Development Services if you need assistance locating this resource for your area or to request training for your staff.

Additional information is also available at:

- GDOL: www.dol.state.ga.us/wp/layoff services.htm
- USDOL: www.doleta.gov/tradeact/2002act\_index.cfm

#### Thich must be accessed first for training, WIA, HOPE (Helping Outstanding Pupils Educationally) or Pell resources? Do any of the funding sources take precedence?

Although WIA regulations say that WIA should, "...supplement other sources of training grants," WIA and Pell federal regulations offer somewhat conflicting guidance about priority use of funds. WIA is generally the fund source of last resort - a potential source of funding to fill gaps for customers who are unable to obtain sufficient grant assistance from other sources (e.g., Pell, HOPE, TANF). WIA funds can be used either to pay the costs of training or provide assistance beyond available resources if there is a documented need in a customer's record that is not covered under the other fund sources.

Georgia's Hope Scholarship Program provides scholarship and grant assistance to residents of Georgia attending eligible postsecondary institutions located in Georgia. The program includes four components:

- Students with a "B" average who are seeking a degree at a University System of Georgia institution or Department of Technical and Adult Education (DTAE) institution may option a HOPE scholarship to cover tuition, mandatory fees, and receive a book allowance (up to \$300/year).
- Students with a "B" average who are seeking a degree at an eligible private college or university in Georgia may obtain a HOPE scholarship in the amount of \$3,000 per academic year for full-time study or \$1,500 per academic year for half-time study.

- Residents of Georgia, regardless of their grade average, may receive a HOPE
  grant to cover tuition, mandatory fees, and a book allowance (up to \$300/year) to
  seek a technical certificate or diploma at a DTAE institution of University System
  of Georgia institution.
- GED recipients may receive \$500 toward their educational costs at an eligible private college or university, a DTAE institution, or a University System of Georgia institution.

The HOPE regulations do not prevent students from receiving other student aid, including WIA. Nor do the HOPE regulations require WIA funds or any other aid programs to be used first, before HOPE. A primary restriction in the HOPE regulations is that HOPE scholarship and grant funds must be used for tuition and HOPE approved fees not for any other educational expenses like room or meals. However, in some cases, eligible public postsecondary institutions may apply HOPE book allowance funds to a student's direct charges (including fees, room, and meals) if the institution obtains his or her written or electronic authorization.

If a student receives a scholarship or grant specifically earmarked for tuition and fees, the HOPE scholarship will be reduced by the amount equaling the scholarship or grant amount. In most cases the student is able to use the funds from the other programs for room and meals and use HOPE for tuition and fees. For more information regarding HOPE, visit the following:

- Georgia Student Finance Commission: www.gsfc.org
- GAcollege411: www.GAcollege411.org.

When making local policy, realize that increased use of Pell for tuition/training may increase the proportion of WIA and partner dollars needed for support and living expenses. Using WIA funds for tuition/training may free Pell dollars to address the latter. If local policy does dictate that Pell is to be used for tuition prior to WIA funds, then WIA funds may be used pending Pell grant application with later reimbursement to be made as applicable. One-Stop staff should work with the customer and institution to determine the total cost of attendance, including living expenses, to conclude if any payback would be required.

When the WIA Final Rules were issued in August 2000, Page 49329 of the preamble noted that clarification of the order of payment for training costs for individuals eligible for both WIA activities and Pell Grant education assistance would be forthcoming. Since written federal guidance has not been issued, Georgia encourages local areas to exercise maximum flexibility in their interpretation of Section 663.320.

A critical role of One-Stop staff is to help customers pull together a package of financial aid from many sources to help them achieve their training and employment goals.

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# How about WIA, Trade Act Assistance, and National Emergency Grant (NEG) funds? Do any of the funding sources take precedence?

As noted in the preceding question, Section 663.320 of the Final Rules states that WIA funds should be used when other funding sources are not available, or when assistance is required beyond that available from other sources. However, in a December 2003 Trade meeting, USDOL clarified that establishing an order of payment between WIA, Trade, and National Emergency Grants was a state decision. Georgia chose not to establish such a requirement regarding the order of payment of WIA, Trade, and NEG funds, and instead encourages local areas to exercise maximum flexibility in determining which order makes the most sense based on local circumstances

For example, Trade funds are now allocated by formula to the State to serve workers without regard to local area. These funds may run out during the course of the year. At the same time, certain local areas may not be able to meet WIA expenditure requirements, so in some cases they would be better off using WIA formula grants to serve dislocated workers, even if they're eligible for Trade. In this scenario, the Trade funds could be used in other areas of the state where they are needed.

Or, a local area may have funds to serve dislocated workers through formula WIA funds, National Emergency Grant funds (which are also WIA funds), and state level Trade funds. Since NEG funds were requested to serve a particular layoff, those funds would be used first for the affected workers.

## $m{H}$ ow can we provide training under WIA for someone already enrolled at a technical college?

It is a matter of local policy to determine whether WIA should be used to enable someone to complete a course of study initiated under non-WIA funding. (Such a policy is sometimes referred to as a student "pick-up" policy.) Sources such as HOPE, Pell, sometimes referred to as a student "pick-up" policy.) Sources such as HOPE, Pell, TANF, and others must be considered first. Such issues as occupations in demand, the student's grades, economic status, as well as need, should also be considered in such policies.

### SUBPART D - INDIVIDUAL TRAINING ACCOUNTS

663.400 How are training services provided?

663.410 What is an Individual Training Account (ITA)?

hat is an Individual Training Account (ITA)?

An Individual Training Account (ITA) is essentially a voucher given to eligible customers who need occupational skills training to become gainfully employed or reemployed. Supported by assessment and informed decision-making, customers may use their WIA-funded ITAs to purchase training slots in any program on the Eligible Program/Provider List (EPL), within Local Workforce Board policy limits. Local workforce boards may establish monetary and time limits for such vouchers. Additionally, Local Boards will identify local training needs identified by area businesses, and will include these local training needs in their respective local WIA plans.

## hat are the specific related federal regulations related to the ITA/EPL?

All related federal WIA regulatory citations related to the ITA/EPL adult services and activities described in Sections 663.400 – 663.595 are identified in Section 3/WIA Adult Training Activities of the GDOL WIA/Goodworks Program Review Guide. (See Appendix 15)

663.420 Can the duration and amount of ITA's be limited?

an the duration and amount of ITA's in Georgia be limited?

Local Workforce Boards are allowed to set local policy regarding which customers and programs they prioritize when expending WIA training funds, monetary and time limits for participation in programs and ITAs issued, etc. A Local Board may choose not to pay for approved training with WIA ITA funds based on its locally determined need for that training, labor market information, cost and performance limits, etc.

Under what circumstances may mechanisms other than ITA's be used to provide training services?

### Under what circumstances may mechanisms other than ITA's be used to provide training services in Georgia?

Section 663.430 describes three exceptions whereby mechanisms other than ITAs may be used to provide training services. The inclusion of these exceptions seeks to maximize customer choice in the selection of training providers. Training services provided by onthe-job-training, customized training, and contracted training with community based organizations or other private organizations with demonstrated effectiveness in serving special adult participant populations are key exceptions to the use of ITAs.

On-the-Job Training (OJT)

OJT is provided by an employer in the public, private or non-profit sector. A contract may be developed between the employer and the Local Workforce Board or its contractor that provides occupational training for WIA participants for reimbursement to the employer up to a maximum of 50% of the wages actually paid to participants.

OJT contracts shall be limited to the period of time required for the participants to become proficient in the occupations for which training is being provided. In determining the length of the contract, consideration should be given to the skill requirements of the occupation, academic and occupational skill level of the participants, prior work experience and the participants individual employment plan.

Local Boards are prohibited from contracting for OJT services with employers that have demonstrated a history of failure to provide OJT participants with continued, long-term employment. Additionally, OJT participant's wages, benefits and working conditions must be equal to those provided to regular employees with similar length of services and duties. Local Workforce Boards must develop and apply local policy to ensure adherence with these requirements.

#### Customized Training (CT)

Customized training is designed to meet special requirements of the employer, and conducted with a commitment by the employer to employ or continue to employ individuals upon successful completion of training. The employer pays at least 50% of the cost of training.

### Community-Based Organizations Serving a Hard-to-Serve Population

A third allowable exception to the use of ITAs is contracted training with community-based organizations (including faith-based organizations) or other private organizations with demonstrated effectiveness in serving special adult participant populations that face multiple barriers to employment, as determined by the Local Workforce Board. The use of such contracted training must be in accordance with Local Board policy ensuring the special adult populations will be limited to individuals determined to be low-income and also one of the following: individuals with substantial cultural or language barriers; Local Workforce Board.

### O you have suggestions for maximizing WIA benefits to customers?

One way to maximize WIA benefits to customers is to consider contracting with community based organizations that provide services to customers not easily served through ITAs. Such training services would have to meet the requirements of Section 663.430. This limits non-ITA training to programs of demonstrated effectiveness offered by community based organizations or other private organizations to serve special populations that face multiple barriers to employment.

Demonstrated effectiveness must be determined based on criteria developed by the Local Board, which may include: financial stability of the organization, demonstrated performance in the delivery of services to the applicable special population, and linkage between the specific program and workforce needs identified in the local plan.

These populations are further defined as low-income individuals in one or more of the following categories: individuals with substantial language or cultural barriers, offenders, or homeless individuals.

What are the requirements for consumer choice?

What are Georgia's requirements for consumer choice?

A key philosophical foundation of the WIA is "informed customer choice." An approved ITA program/provider system requires WIA career advisors to assist customers in making informed choices regarding career paths and training. Staff may inform customers and facilitate career decisions, however, the ultimate decision rests with the customer within defined Local Workforce Board policies and parameters. The primary role is to provide customers with guidance and feedback from assessment that can help role is to provide reached and choices prior to selection of a training program/provider.

Local Workforce Boards, via their One-Stop delivery system, will provide job seekers, employers, and other interested individuals direct access to a comprehensive list of career, education, and training information in automated and/or paper format.

#### SUBPART E ELIGIBLE TRAINING PROVIDERS

663.500 What is the purpose of this subpart?

663.505 What are the eligible providers of training services?

That are eligible providers of training services in Georgia?

Eligible providers of training services are those entities eligible to receive WIA funds pursuant to WIA 134(d)(4)(C) for the provision of training services to eligible customers. To be eligible to receive funds, providers may apply for program approval under two categories.

#### Initial Automatically Eligible Provider Programs

To receive adult and dislocated worker funds under this category, a prospective training provider's program must meet the following criteria:

Post-secondary educational programs that are eligible to receive funds under Title IV
of the Higher Education Act of 1965 (HEA) and provide programs that lead to an
Associate Degree, Bachelor's Degree, or Certificate; and

Programs under the National Apprenticeship Act (NAA) of 1937.

Providers and their programs eligible to apply for approval under this category include universities, colleges, community colleges, technical institutes, some proprietary schools, and apprenticeship programs registered with the USDOL Bureau of Apprenticeship Training.

#### Other Initially Eligible Provider Programs

To receive adult and dislocated worker funds under this category, prospective training provider's programs must meet criteria established by the Governor, including:

- Public and private providers of a program of training services, which includes entities such as vocational-technical schools, community- and faith-based organizations, private training companies, labor organizations, employer organizations, private individuals, and entities that provided training under the Job Training Partnership Act (JTPA)
- A post-secondary educational institution wishing to receive training funds for a program(s) which does not lead to an associate or baccalaureate degree or certificate or is not funded under Title IV of the Higher Education Act of 1965
- An apprenticeship program wishing to receive training funds for a program not registered with the Federal Bureau of Apprenticeship Training; or
- A local workforce board that has applied for and been granted a waiver by the Governor as outlined in WIA 117

663.508 What is a "program of training services"?

663.510 Who is responsible for managing the eligible provider process?

## W ho is responsible for managing the eligible provider process in Georgia?

Although no single entity has full responsibility for the entire process, GDOL coordinates the development of the training provider selection system in a collaborative effort with Georgia's 20 Local Workforce Boards, as well as other partners.

Local Boards are responsible for developing and implementing procedures for the local solicitation of all providers, including public notice, announcements, bidders conferences, etc., including a request for performance information on all students enrolled, services to special populations, evidence of training in growth occupations, etc. At the discretion of the Local Workforce Board, training providers may also be solicited from outside the local area, including other states.

The Local Board is responsible for ensuring that the training providers have access to the forms for making application, a list of demand occupations for its area, and will make every effort to regionally coordinate such application activities with adjacent local workforce areas. Training should be in occupations in demand in each local area.

GDOL is responsible for the development, operation, and maintenance of the statewide Internet-based Eligible Provider List (EPL) and approved programs. This list contains specific consumer information for each approved program. The EPL, which is hosted by Georgia State University, can be accessed at: <a href="www.gcic.edu/gawia/">www.gcic.edu/gawia/</a> or <a href="www.dol.state.ga.us/js/wia\_ita\_providers.htm">www.dol.state.ga.us/js/wia\_ita\_providers.htm</a>.

663.515 What is the process for initial determination of provider eligibility?

hat is the process for initial determination of provider eligibility in Georgia?

Local Workforce Boards are required to ensure public notification to prospective providers of ITA application opportunities. For responding providers wishing to have an occupational skills training program initially (i.e., for the first time) approved for ITA index of the program in the program to an evaluated by a Local Board of their choice. If approved, the Local Board then recommends the program to GDOL for statewide in the program and approval. Applications need only be made with one Local Workforce Board for possible inclusion on the statewide EPL. Once approved on the statewide EPL, an approved program is available to all local workforce areas and cooperative states.

A generic application and instructions can be accessed at:

www.gcic.edu/gawia/doc/etp\_application.htm. There is also a link to the Local
Workforce Boards with whom providers may apply. In most cases, providers are able to
transmit applications electronically. Local Boards may also request additional
information of providers.

WIA requires that programs of study, not providers, be approved for ITAs. All prospective training providers must submit an application for each proposed program of study. The application requests information on programs, cost, and past performance.

Most proprietary colleges and schools operating in Georgia are required by the Nonpublic Postsecondary Educational Institutions Act of 1990 (NPEIA) to have a certificate of authorization from the Georgia Nonpublic Postsecondary Education Commission (NPEC) before beginning operation or advertising in the state. This certificate must be renewed annually. Certain proprietary colleges or schools fall within the purview of other state overseers such as Commercial (truck) Driver Licensing (which falls under Georgia Public Safety), and Certified Nursing Assistance (which falls under the Georgia Medical Care Foundation). The NPEC can be accessed at: <a href="https://www.gnpec.org">www.gnpec.org</a>

During the initial determination of provider eligibility, Local Workforce Boards evaluate providers and proposed training programs for initial eligibility, based on (at a minimum) standardized local criteria of proven effectiveness, local employer/industry demand, accreditation, and customer accessibility. The process may include (but is not limited to) obtaining copies of performance reports from accrediting/licensing entities or Local Workforce Boards, contacting a sample of past students, or conducting on-site pre-award visits. A formal appeals process for aggrieved ITA providers of unapproved training programs must also be made available.

A non-automatically eligible training provider may be locally denied approval for a training program for the following reasons:

- The application is not complete or is not submitted within required time frames
- Performance data is not included with the application
- Performance data does not meet minimum Local Workforce Board standards
- Inaccurate information regarding a program is intentionally supplied, or
- Training programs do not support the demand occupation for the area

The requirement for performance data may be waived by the Local Workforce Board upon showing of good cause. "Good cause" may include the following:

- The training program is new and data on past performance is not available
- Only partial performance data is available (either type of data or number of years)
- Collection of data will cause excessive costs and/or hardship for the training provider during the initial period (provider must develop such requisite performance data for subsequent eligibility consideration), or
- Other reasonable circumstances that may cause data to be unavailable

Training providers retain the right to appeal such decisions.

The Local Workforce Board then submits its recommended program(s) to GDOL for consideration. Within 30 calendar days of receipt of these local recommendations, GDOL will review, approve (or disapprove), and publish the approved program of study on the EPL as initially eligible to provide WIA-funded training services to WIA-eligible participants. Likewise, the local board will be informed of any disapproved programs of study by GDOL within 30 calendar days of receipt of these local recommendations.

Is there a time limit on the period of initial eligibility for training 663.530 providers?

s there a time limit on the period of initial eligibility for training I providers in Georgia?

Initial eligibility is granted for a 12-18 month period. Training providers whose programs are approved during this initial eligibility period will remain on the statewide-approved list unless otherwise removed for cause.

663.535 What is the process for determining the subsequent eligibility of a provider?

# hat is Georgia's process for determining subsequent eligibility of a provider?

The Workforce Investment Act requires a redetermination of ITA program eligibility through a subsequent eligibility process every 12 months. For a program to remain eligible to receive ITA funds for new enrollments, the State is required to annually compare program-level performance outcomes against established minimum standards.

GDOL annually accepts applications for subsequent eligibility status. Providers are asked to complete an application with attention given to each proposed program. These subsequent eligibility applications only address programs currently approved on the EPL that are seeking reapproval. If providers of currently approved ITA programs are interested in proposing new training offerings, providers should refer to the initial eligibility requirements. If reapproved, a program's subsequent eligibility will extend for an additional year.

Upon a determination that an application submitted by a training provider does not meet the subsequent eligibility requirements set forth in the Act and corresponding federal regulations, a removal notice is issued by GDOL to the provider within thirty (30) calendar days of determination. Training providers retain the right to appeal such decisions within 30 calendar days of the date of the denial.

(See Appendix 16, State of Georgia Individual Training Account Information Guide, for additional information)

663.540 What kind of performance and cost information is required for determination of subsequent eligibility?

That kind of performance and cost information is required for determinations of subsequent eligibility in Georgia?

The following verifiable program-specific performance information is submitted directly to GDOL by providers seeking annual renewal of their ITA program(s).

#### All students (including WIA students):

- Completion rates for all individuals participating in the applicable program
- Percentage of all individuals participating in the program who obtained unsubsidized employment, and

Wage at entered employment

By virtue of data contained in GDOL's GWS System, the State also analyzes the following program-specific performance information:

#### WIA Students:

- Percentage who completed the applicable program and placed in unsubsidized employment
- Retention rates in unsubsidized employment of participants who completed the applicable program six (6) months after the first date of employment
- Wages received by participants six (6) months after the first day of employment, and
- Rates of licensure or certification, degree attainment of academic degrees or equivalents, or attainment of other measures of skills of the graduates of the application program

Regarding program costs, providers seeking annual renewal of their ITA program(s) send information to GDOL documenting their proposed tuition, fees, and other related costs, which may include, but are not limited to, books, tools, clothing, and equipment.

The State may accept from a provider eligible under Title IV of HEA, program-specific performance information consistent with the requirements for eligibility under Title IV of HEA, if the information is substantially similar to the information otherwise required.

663.550 How is eligible provider information developed and maintained?

## How is Georgia's eligible provider information developed and maintained?

Training provider programs will have tentative local approval upon acceptance and approval of the program application by the Local Workforce Board. Training providers will appear on the statewide EPL after GDOL verifies the eligibility and state-approves the program, within 30 days of receipt from the local board. As new programs are submitted and approved throughout the year, the statewide list will be updated on an ongoing basis. If the program is found to be ineligible for the statewide list, the Local Board will not approve ITAs for that program.

Throughout the year, Local Workforce Boards review and approve requested provider and program informational changes, and transmit this information to GDOL via the GWS for statewide review, approval and publication.

663.555 How is the State list disseminated?

Dow is Georgia's State Eligible Provider List disseminated?

Georgia's internet-based EPL is accessible 24 hours per day, seven days per week at: www.gcic.edu/gawia/.

663.565

May an eligible training provider lose its eligibility?

Tow may an eligible training provider may lose its eligibility in **II** Georgia?

Training providers may be removed from the statewide EPL by GDOL under the following conditions:

- If inaccurate information regarding a program is intentionally supplied to the Local Workforce Board or GDOL, a termination of eligibility for that program will occur. The termination will remain in effect for a minimum of one (1) year.
- If the Local Board or GDOL determines that an eligible provider has substantially violated any requirements under the Act, the provider must implement corrective action as deemed appropriate.
- If training providers do not reapply for program renewal under subsequent eligibility procedures, their non-renewed programs will be removed from the list. They may resubmit the removed programs after six (6) months.

Note: If a provider's program fails to meet or exceed minimum established local performance levels, the provider's eligibility to receive funds for that program may be suspended by the Local Workforce Board, for a period established by the Local Board. However, the provider's program would remain on the EPL for availability to other workforce areas.

Training providers retain the right to appeal such decisions.

What is the consumer reports system? 663.570

That is Georgia's consumer reports system?

Georgia's Eligible Provider List system historically lists over 180 ITA training providers and over 5,800 approved ITA programs of study statewide. Each of Georgia's 12 planning regions and 20 local WIA areas has multiple approved ITA programs of study located within their area. There are sorting functions available by program of study, institution name, and geographical area or key word search. There are also available hyperlinks to all local WIA Area homepages/contacts, Georgia Labor Market Explorer, training institution web sites, etc.

The consumer report system contains information necessary for adults and dislocated workers to choose a program of training services. These factors include, but are not limited to, overall program performance, duration of training programs, and requisite entrance criteria.

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663.575	In what ways can a Local Board supplement the information available from the State list?

May individuals choose training providers located outside of the local area?

 $m{M}$ ay individuals choose training providers located outside of Georgia?

Local Workforce Boards may utilize programs that are ITA approved/listed by other states. As Local Boards have the statutory right to establish local policy related to tuition limits, out-of-state training usage, demand occupations, etc, awareness of these factors is important to any customer who may seek WIA funding for an out-of-state program through a Local Board.

GDOL has provided a link to ITA provider list web sites for all states at the bottom of the EPL (www.gcic.edu/gawia/) or visit: www.careeronestop.org/WiaProviderSearch.asp.

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	the based organization (CBO) be included on an
663.590	May a community-based organization (CBO) be included on an
000,000	eligible provider list?
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663.595 What requirements apply to providers of OJT and customized training?

### SUBPART F - PRIORITY AND SPECIAL POPULATIONS

What priority must be given to low-income adults and public assistance recipients served with adult funds under title !?

## hat factors can our Local Board consider relative to limited funds for training?

In the event that funds are limited, priority for intensive and training services must be given to recipients of public assistance and other low-income individuals. After these low-income considerations, Georgia has established the following guidelines to assist Local Boards in this task:

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- Where training funds are limited, local areas may choose to prioritize services for individuals. Policies at the local level may give priority to individuals with one or more characteristics of special target populations. Some examples of these characteristics are: unemployed, lacks a high school diploma or GED, poor work history, offender, limited English-speaking, poor basic skills, TANF or Food Stamp recipient, underemployed, or other factors most relevant to the community.
- Local areas will identify and prioritize training in occupations in demand in the local labor market. An occupation in demand may include a job where there is limited demand, but an individual has a bona fide job offer contingent upon completion of training.
- Training funds should generally be used to build on existing skills first. If an individual may be trained for a quality job more quickly and economically by building on existing skills, that may take precedence over training the individual for an entirely new occupation. The customer's interests, the demands of the labor market, and limited funds must be taken into consideration.

Can you provide any assistance in defining "limited funds"? Could we say that when a certain percentage of funds have been spent (specifically ITAs) that the priorities would then kick in?

According to the legislative discussion, "limited funds" is a definition to be determined by the local Workforce Investment Board and pertains to priorities of intensive and training services to those individuals "most in need," such as welfare recipients, other low-income individuals, and individuals with barriers to employment. The limited funds priority requirement does not apply to core services.

Setting a threshold on the percentage of ITA funds spent may not reflect the total obligation picture. Some of the local areas have support services policies that complement training services paid for by HOPE and Pell and are a more accurate indicator of fund limitations.

Does the statutory priority for use of adult funds also apply to dislocated worker funds?

How do the Welfare-to-Work program and the TANF program relate to the One-Stop delivery system?

### How does GoodWorks fit in with WIA?

GoodWorks, a statewide service strategy that helps TANF applicants and recipients become employed and move to self-sufficiency, is the beginning of a continuum of lifelong learning and career development services provided through Georgia's broad workforce development system.

Local partners work cooperatively to design a business process that makes sense for their community. In some areas, certain customers receiving TANF benefits may be consoled in GoodWorks and WIA, with different services provided by each funding source. In other areas, GoodWorks customers are transitioned to WIA when additional training or other WIA-funded services are appropriate. GoodWorks requires that localities use existing TANF funds and other resources (e.g., WIA, Wagner-Peyser) to provide services.

GoodWorks is a part of the larger workforce development system that includes a variety of entities and their services, e.g., GDOL, DHR, DTAE, community based organizations, service providers, and other partners. It is up to each local workforce area to determine how all of the "pieces" fit best together to serve customers.

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	to a godinaged homemaker quality for services under the re-
663.630	How does a displaced homemaker qualify for services under title I?
000.	

May an individual with a disability whose family does not meet income eligibility criteria under the Act be eligible for priority as a low-income adult?

### SUBPART G - ON-THE-JOB TRAINING (OJT) AND CUSTOMIZED TRAINING

663.700 What are the requirements for on-the-job training (OJT)?

Nost on-the-job training (OJT) brokers depend on cost reimbursement contracts to keep services available, with budgets based on an expected number of customers referred from the One-Stop center. With the level of referrals uncertain due to expanded customer choice under WIA, how can OJT brokers maintain a viable operation? Can you help with some ideas or suggestions?

From an OJT broker's perspective, they have to demonstrate the ability to access demand occupations that address local employer needs, coupled with an ability to promote their services to job seeker customers within a One-Stop environment. Local area administrators must exercise careful and frequent review of contracted OJT performance and expenditures, with timely contractual corrective action. As is the case with any cost reimbursable agreement, the return on investment should continuously be weighed against the cost being incurred.

Should the employer or local workforce development board issue the OJT certification of competency attainment?

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No. With the implementation of common measures, local workforce areas are no longer able to issue their own credential or certificate for OJT. As stated in TEGL 17-05, Common Measures Policy for the Employment and Training Administration's (ETA) Performance Accountability System and Related Performance Issues (Attachment B: Definitions of Key Terms), issued in February 2006, "A certificate is awarded in recognition of an individual's attainment of measurable technical or occupational skills necessary to gain employment or advance within an occupation. These technical or occupational skills are based on standards developed or endorsed by employers. Certificates awarded by workforce investment boards are not included in this definition....."

Please see TEGL 17-05 and Attachment B for additional parameters for credentials and certificates.

hat is the acceptable credential for adults who successfully complete OJT?

As outlined in TEGL 17-05, Attachment B: Definitions of Key Terms, a credential must be issued by a recognized institution such as a state educational agency, an institution of higher education, a professional industry, a registered apprenticeship program, a public regulatory agency, a program approved by the Department of Veteran's Affairs, or Job Corps.

hat tools should be used to certify an attainment of competencies for OJT? Work Keys? Dictionary of Occupational Titles (DOT) standards? O\*NET? The occupational skills training outline listing each competency and worker's attainment?

Since the only credential or certification that qualifies for OJT is issued by a recognized institution, it is no longer necessary to test for skills attainment attached to the OJT jobsite.

The types of OJT placements we make are varied and there is no credential available as defined by TEGL 17-05 that we can use. As a result, we think our OJT customers will count against us in our performance. What can we use as a credential?

In June 2006, GDOL requested a waiver from USDOL so that OJT customers would not be required to get a credential using the Common Measures definitions. However, this waiver request was denied.

While some local areas have anticipated that this change will adversely impact performance, our approach is to wait to see if local area performance is indeed negatively impacted. Since OJT programs in most areas represent a very small proportion of customers, we believe the impact may be minimal. However, in those local areas where OJT does clearly lower performance because no recognized credential is available, we will be willing to renegotiate performance on this measure.

OJT services can be of significant value to some of our customers, and we do not recommend eliminating or cutting back OJT programs because of performance concerns at this time. For additional information, please contact GDOL Career Development Services.

### $m{I}$ s there a prohibition against OJT for customers who have participated in Georgia Works?

No. There is no prohibition against this - OJT might be an appropriate option, depending on the needs of the individual customer and local area policies regarding OJT.

Georgia Works, a GDOL training initiative designed to stimulate job growth and hiring, allows laid-off workers who qualify for UI benefits to receive onsite workplace training, regular UI benefits, and a special training allowance for a maximum of 24 hours per week for up to eight weeks.

If, at the end of the Georgia Works training period, assessment indicates the customer is still deficient in a particular skill area(s), OJT with the same or a different employer might be explored – in accordance with the area's local OJT policy.

might be explored.			
663.705	What are the requirements for OJT contracts for employed workers?		
663.710	What conditions govern OJT payments to employers?		
663.715	What is customized training?		
663.720	What are the requirements for customized training for employed workers?		
663.730	May funds provided to employers for OJT or customized training be used to assist, promote, or deter union organizing?		

#### SUBPART H - SUPPORTIVE SERVICES

663.800 What are supportive services for adults and dislocated workers?

Is the paying of car repairs permitted as part of the supportive services that might be offered to WIA participants?

Yes. Local workforce boards have the authority to offer payment of car repairs to their customers, according to the preamble (Part 663/Subpart H) of the Final Rules. WIA funds are one of many possible funding sources that you will need to explore in order to determine whether it makes sense to support this activity through WIA in your community. Local policy must address coordination with other entities to ensure non-duplication of resources and services, and limits on the amount and duration of such services. Local areas must ensure that the services provided are needed for the individual to participate in appropriate activities and are not available through other sources.

### Can local supportive service policies include payments for dependent care other than for children?

Yes. Under Subpart H of the WIA Final Rules, it is clear that local areas have discretion to provide supportive services as they deem appropriate to meet individual's needs in their local community. The preamble further strengthens the intent for local areas to have flexibility in developing their supportive service strategies.

Keep in mind that local supportive service policies and procedures must address coordination with other entities to ensure non-duplication of resources and services.

663.805 When may supportive services be provided to participants?

Are there limits on the amounts or duration of funds for supportive services?

Can we build in room for "exceptions" to limits in our actual supportive service policy to maximize our ability to meet unanticipated customers' needs?

Yes, and we encourage you to do so. The Local Board may establish limits on the type and amount of supportive services customers can receive (or authorize the One-Stop operator to do so), and may also establish policy for granting exceptions to the authorized limits. Many local areas have formalized a simple process for granting exceptions in order to maximize their flexibility in meeting unmet needs. Oftentimes, a small payment helps ensure a customer's success.

helps ensure a customer's success.		
663.815	What are needs-related payments?	
663.820	What are the eligibility requirements for adults to receive needs-related payments?	
663.825	What are the eligibility requirements for dislocated workers to receive needs-related payments?	
663.830	May needs-related payments be paid while a participant is waiting to start training classes?	

Does the State have a policy authorizing local areas to extend the 30-day authorization for needs-related payments for customers awaiting the start of training?

No. Requests for authorization of such extensions should be directed to the GDOL Career Development Services Division and will be considered on a case-by-case basis.

How is the level of needs-related payments determined?

